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22 *Signature Page]*

23 UNITED STATES DISTRICT COURT
24 NORTHERN DISTRICT OF CALIFORNIA
25 SAN FRANCISCO DIVISION

26 IN RE OPTICAL DISK DRIVE PRODUCTS)
27 ANTITRUST LITIGATION)

MDL No. 3:10-md-2143 RS

28)
CORRECTED STIPULATION AND
[PROPOSED] ORDER TO AMEND
COMPLAINT AND VOLUNTARY
DISMISSAL OF CERTAIN CLASS
REPRESENTATIVES

DATE ACTION FILED: Oct. 27, 2009

29 This Document Relates to:

30 ALL INDIRECT PURCHASER ACTIONS

WHEREAS, the indirect purchaser plaintiffs filed a Corrected Second Amended Class Action Complaint on October 18, 2011;

WHEREAS, the indirect purchaser plaintiffs have indicated that, due to unforeseen personal circumstances, the following class representatives no longer wish to serve as class representations: Laura Allen, Pradeep Arora, Lucas Bina, Cindy Bozan, Robert Cavalear, Andrew Crosby, Casey Hauser, Mary Jane Garland, David Knight, Debra Knight, Thomas Lewis, Bobbi Milam, Linda Moss, Ramona Ravan, Benjamin Roberts, and Anthony Sterling; and

WHEREAS, defendants will not oppose the substitution of the representatives as indicated in the following chart, reserving all of the legal rights and any defenses defendants may have, including but not limited to any objections to the adequacy of the new proposed class representatives:

Former Class Representative(s)	Involved State	New Class Representative(s)
Mary Jane Garland	Iowa	Jerome Hilscher
Pradeep Arora	Hawaii	Barney Gooman, Jr.
Laura Allen	Kansas	Benjamin Murray
Linda Moss	Maine	Scot Larrabee
Robert Cavalear	Massachusetts	
Casey Hauser	Montana	Matthew Hosking
Benjamin Roberts	New Hampshire	Evan Ravenelle
Thomas Lewis	New York	Susie Lim
Lucas Bina	North Dakota	Dion Pacheco
David Knight and Debra Knight	Oregon	Mike Bishop
Ramona Ravan	South Carolina	Kyle Kovalchek
Andrew Crosby	Tennessee	Kim Wood
Anthony Sterling	South Dakota	
Cindy Bozan	Vermont	Gregory Westerkamp

Former Class Representative(s)	Involved State	New Class Representative(s)
Bobbi Milam	West Virginia	Brian Ice

WHEREAS, defendants agree to the filing of a third amended complaint by the indirect purchaser plaintiffs, for the purpose of making the above substitutions of proposed class representatives; and

WHEREAS, in exchange for the agreement to the substitution of class representatives, each of the above new class representatives agrees to produce verified interrogatory responses to Defendant Panasonic Corporation's First Set of Interrogatories to Indirect Purchaser Plaintiffs, and to produce all documents in each new class representative's possession responsive to Defendant Toshiba Corporation's First Request for Production of Documents to Indirect Purchaser Plaintiffs within fifteen days of the Court's approval of this stipulation and the filing of an amended complaint;

NOW THEREFORE, IT IS HEREBY STIPULATED by and between the undersigned counsel for the parties as follows:

1. The indirect purchaser plaintiffs will file a third amended complaint, as outlined above;
2. The parties stipulate to the voluntary dismissal without prejudice of the claims of Laura Allen, Pradeep Arora, Lucas Bina, Cindy Bozan, Robert Cavalear, Andrew Crosby, Casey Hauser, Mary Jane Garland, David Knight, Debra Knight, Thomas Lewis, Bobbi Milam, Linda Moss, Ramona Ravan, Benjamin Roberts, and Anthony Sterling; and
3. Each of the new class representatives shall produce verified interrogatory responses to Defendant Panasonic Corporation's First Set of Interrogatories to Indirect Purchaser Plaintiffs, and shall produce all documents in each new class representative's possession which are responsive to Defendant Toshiba Corporation's First Request for Production of Documents to Indirect Purchaser Plaintiffs, within fifteen days of the Court's approval of this stipulation and the filing of the indirect purchaser plaintiffs' third amended complaint.

1 IT IS SO STIPULATED.

2
3 DATED: March 13, 2013

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25 * * *

26 IT IS SO ORDERED.

27 DATED: 3/14/13

28 

HONORABLE RICHARD SEEBORG
UNITED STATES DISTRICT COURT JUDGE